II. REMARKS

Claims 1-39 and 41 are pending in this application. By this amendment, claims 1, 2, 21, 30, and 39 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Entry of this Amendment is proper under 37 C.F.R. 1.116(b) because the Amendment: (a) places the application in condition for allowance as discussed below; (b) does not raise any new issues requiring further search and/or consideration; and (c) places the application in better form for appeal. Accordingly, Applicants respectfully request entry of this Amendment.

In the Office Action, the information disclosure statement filed on 8/24/2001 allegedly fails to comply with 37 CFR 1.98(a)(2). Applicants have included pages 43-46 of IBM TDB Vol. 39, No. 10 in response to this rejection. Accordingly, Applicants submit that the information disclosure statement now complies with 37 CFR 1.98(a)(2).

A. NON-STATUTORY SUBJECT MATTER

In the Office Action, claim 41 is rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter. Applicants submit that claim 41 does not recite only program code. Applicants respectfully request that the Examiner provide examples of acceptable statutory claim language to overcome the 35 U.S.C. §101 rejection.

B. REJECTION OF CLAIMS 1-4, 11-12, 14-19, 30-36, 38-39, and 41 UNDER 35 U.S.C. 102(e)

In the Office action, independent claims 1, 30, 39, and 41 are rejected under 35 U.S.C. 102(e) as allegedly anticipated by Keller et al. (US 2002/0102028), hereinafter "Keller." Reconsideration in view of the following remarks is respectfully requested.

With respect to claim 1, Applicants submit that Keller fails to disclose, *inter alia*, the step of reducing, including, "...replacing the image with a size-reduced image version." (*See* claim 1, and as similarly recited in claims 21, 30, 39 and 41.) Interpreting Keller only for purposes of this response, Applicants submit that Keller discloses multiple versions (S1 and S2) of image data S stored in temporary storage medium. *See* ¶ 68. Keller teaches, "...irreversible compressed image data S1 and S2 having different compression ratios are created from stored original image data S org, and stored, along with original image data S org in temporary storage medium 11." Accordingly, the number of image versions in Keller can be as high as four. (*See* ¶ 0070, wherein S org is stored in an archive, while S org, S1, and S2 are stored in temporary storage medium 11.) In Keller, the reduction of S org to S1 does not *replace* S org with S1, nor does S2 replace S1. Every version of image 'S' is stored in memory and available for selection. *See* Keller, ¶ 0068. In contrast, the claimed invention recites, *inter alia*, the step of reducing, including, "...replacing the image with a size-reduced image version." *See* claim 1. In the present invention, reduction includes reducing and replacement of the starting image with the size-reduced image. Data storage requirements are reduced because the copy of the image is reduced and replaced, creating only two copies if an archive version is maintained and one copy if an archive version is not maintained. Accordingly, Applicants submit that Keller fails to disclose, *inter alia*, the step of reducing, including replacing the image with a size-reduced image

version. Applicants submit that Keller fails to disclose each and every feature of claim 1 and respectfully request withdrawal of the rejection.

Claims 2-20 are dependent upon claim 1, and claims 31-38 are dependent upon claim 30. Applicants submit that those dependent claims are allowable for the same reasons stated above, as well as for their own additional features.

C. REJECTION OF CLAIMS 21-23 AND 25-29 UNDER 35 U.S.C. 103(a)

The Office has rejected claims 21-23 and 25-29 under 35 U.S.C. 103(a) as allegedly being unpatentable over Keller in view of Morris et al. (US 5,153,936), hereafter "Morris." Reconsideration in view of the following remarks is respectfully requested.

Applicants assert that the combined references cited by the Office fail to teach or suggest each and every element of the claimed invention. For example, with respect to claim 21, Applicants respectfully submit that both Keller and Morris fail to teach or suggest, *inter alia*, "repeating the steps of reducing and allowing after expiration of the predetermined duration, wherein each reduction replaces a previous size-reduced version."

As stated by the Office, "...Keller does not explicitly teach the step of allowing and repeating recited in Claim 21." (*See* Office Action, p. 8) It is the Office's position that Morris teaches repeating steps of reducing and allowing after expiration of the predetermined duration. (Office Action, p. 9) Morris teaches retrieval and decompression of an *original* high-resolution image if the time period has expired and the low-resolution image has been deleted. (Col. 9, lines 37-53) Morris creates two identical lower resolution images, wherein the second lower resolution image is created from the original high-resolution data, if the first lower resolution image has been deleted. (Column 9, lines 37-53) In contrast, claim 21 of the present invention

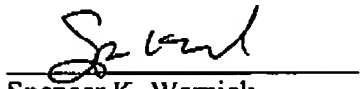
recites, *inter alia*, "repeating the steps of reducing and allowing after expiration of the predetermined duration, wherein each reduction replaces a previous size-reduced version." In the present invention, each subsequent reduction creates a size-reduced version, wherein each size-reduced version replaces the previous image version. Morris however, creates the second lower resolution image from the original image. Accordingly, Applicants submit that Morris fails to teach or suggest, *inter alia*, each reduction replacing the previous size-reduced version. *See* claim 1.

In summary, neither reference discloses or suggests, *inter alia*, the step of, "repeating the steps of reducing and allowing after expiration of the predetermined duration, wherein each reduction replaces a previous size-reduced version," (*See* Claim 21). Applicants submit that the Office has failed to establish a prima facie case of obviousness because the prior art references do not teach or suggest all the claim limitations. Accordingly, Applicants assert that independent claim 21 represents allowable subject matter and request the withdrawal of the rejection. Claims 22-23 and 25-29 are dependent upon claim 21. Applicants submit that those dependent claims are allowable for the same reasons stated above, as well as for their own additional features.

III. CONCLUSION

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, he is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,



Spencer K. Warnick
Reg. No. 40,398

Date: August 30, 2005

(DLP)

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Oct. 1996 ... IBM TECHNICAL DISCLOSURE BULLETIN ... <-- pp43-46 -->

Title: # Internet Image Statements

Text

TDB

Internet Image Statements (IIS) is a proposal for a new High Performance Transaction System (HPTS) product or a new option to the HPTS Image Statement Application. IIS provides banks with a very cost effective alternative for delivering image statements to their customers via the World Wide Web and the Internet.

Sample User Interaction

The first action on the part of the users would be to obtain the required relationship with their bank, and the required hardware and software.

Requirements

The following items would be required before a user would be able to subscribe to Internet Image Statements:

o A relationship with their bank. The bank would register a pass phrase for the user and add the user's account to an internet image statement cycle.
o A computer with any image capable, encryption enabled Web (World Wide Web or WWW) browser, i.e., Secure Sockets Layer (SSL). For example:
- A PC with Microsoft Windows 3.1 and the Netscape browser installed, or
- A PC with OS/2 and the IBM Secure WebExplorer.

Sample Interaction

The following sequence of user interactions briefly illustrate a user's perspective of Internet Image Statements and thus, its potential value. The user...

1. Contacts their bank and subscribes to internet image statements. The user gives the bank a pass-phrase to use for user authentication. The bank gives the user the required port(s) and Universal Resource Locator (URL).
2. Configures the encryption parameters for their browser, i.e., public and private keys and their banks SSL port (usually 443).
3. Launches their browser and enters the bank-supplied URL. The encryption parameters are negotiated automatically by the browser and the banks httpd server. A form is displayed requesting their bank account number and pass phrase. The account number, pass phrase, and all subsequent transmissions are encrypted with either the user or bank's private key.
4. The user selects the desired statement for viewing. The current statement is the default.
5. The user's bank statement is displayed by the browser

in the same format as their paper statements were in the past. After each transaction is a hypertext link to the available check image segments, i.e., an image mapped icon with four selectable regions: Graphical representations of front Black/White (BW), front Gray Scale (GS), back black white, and back gray scale. The user prefers the quality of gray scale images, and selects the front gray scale region for a transaction. In a few moments, the front gray scale image of the check associated with the transaction is displayed in a separate window.
6. The user scrolls to the bottom of the statement to a 'Prin statement' menu. There are several options (e.g., Front BW only, Front and Back GS, etc.) and, since this user prefers the gray scale quality, they select "Front and Back GS". After the new bank statement, complete with attachment pages, is downloaded; the user prints it.

Design Overview

Server-side (Bank) Overview

The structure of the IIS system and steps that are taken by the bank to provide internet image statements are illustrated by the following sequence of processing steps:

1. The bank's capture and archive systems are employed to capture, repair and archive one or more of the front and back, black/white and gray scale check images, i.e., HPTS Distributed Image Capture and Export (DICE) and HPTS Distributed Archive.
2. HPTS Statements Format Image Statements (FIS)/HyperText Markup Language (HTML) is run to process the Statement Print File (SPF), Account Summary File (ASF), and Image Access Key File (IAKF). Files containing bank statements in HTML format are the product of this step.
3. The HTML files created in the prior step are archived via the archive application.
4. The bank operation staff starts the HPTS Internet Image Statements ahscgid daemon process.
5. When the user requests statement HTML or check images, their browser encrypts the request and sends it to the httpd server, which unencrypts it and calls the HPTS Internet Image Statements Common Gateway Interface (CGI) program ahscgit, i.e., IBM* Internet Connection Secure Server for AIX*.
6. The ahscgit program translates the request and writes it to the ahscgid process. The ahscgid process retrieves the HTML text or image data from the archive client, i.e., The OnDemand/6000 Client for AIX. If the data is image data, the ahscg id process also transcodes the images to Joint Photographic Experts Group (JPEG) format, i.e., by calling HPTS Image Distributed Application Services (IDAS) services. The ahscgid program writes its output back to ahscgit program.
7. The ahscgit program reformats the output and returns it to the httpd server, which encrypts and forwards the output to the user's browser.

Supported Transcoding Configurations

The following options are available for determining when images are transcoded from Adaptive Bilevel Image Compression (ABIC) to JPEG format.

Illustrated: Transcode via ahscgid

As described above, ahscgid can transcode images when they are requested by the user. This allows the bank to archive ABIC images, and places no special software requirements on the user.

Transcode prior to archive

As the name implies, the bank can transcode images prior to archiving them. The relative merits between this option and the 'Transcode via ahscgid' option depends on the format the bank prefers to use in the image archive. This option has superior response time from the user's perspective when compared to the 'Transcode via ahscgid' option, yet still places no special software requirements on the user.

No transcoding

Images can be transmitted to the user in ABIC format instead of JPEG. This option places a special software requirement on the user. When a user subscribes for internet image statements, the bank would need to supply a helper applet to display the ABIC images. This option would be attractive if the bank was unable (or unwilling) to transcode the images on the server side.

Conclusion

IBM can provide a means for distributing image statements to banks via the WWW and the Internet. By developing a small number of new programs and arranging existing offerings in an innovative way, IBM can go to market quickly with a novel product.

* Trademark of IBM Corp.

Diagrams: None

Order/Fcode/Docket: **96A 61002 / / CT8960006**
Vol=39 PubNo=10

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